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Sent: Friday, June 02, 2006 7:55 PM
To: NOP Livestock
Subject: response to Docket # TM-05-14

Attachments: ATTACHMENT.TXT

Mark A. Bradley, Assoc. Deputy Administrator
Transportation and Marketing Programs
National Organic Program
1400 Independence Ave., SW
Room 4008- So. Ag Stop 0268
Washington, D.C. 20250

I am writing to comment on the Organic feed regulations on Docket # TM-05-14. I am a former NOSB member, mother and organic hay farmer. Dairy cattle need to have access to grazing for a significant part of their nutrition. This has been a stand from the NOSB for a long time. I sell dairy hay to organic dairy farmers, but I want the milk my family drinks to come from cows that have a substantial part of their nutrition from grazing. Confinement for most of the cows lives for convenience isn't my idea of organic. Please consider making the following changes to clarify "access to pasture requirements".

? RUMINANT LIVESTOCK MUST GRAZE PASTURE FOR THE GROWING SEASON
BUT
NOT LESS THAN 120 DAYS PER YEAR.

? THE GRAZED PASTURE MUST PROVIDE A SIGNIFICANT PORTION OF THE
TOTAL
FEED REQUIREMENTS BUT NOT LESS THAN 30% OF THE DRY MATTER INTAKE DURING
THE GROWING SEASON.

§ 205.237 Livestock feed.

(b) The producer of an organic operation must not:

(7) Prevent dairy animals from grazing pasture during lactation, except as allowed under §205.239(b).

(c) Ruminant livestock must graze pasture for the growing season but not less than 120 days per year. The grazed pasture must provide a significant portion of the total feed requirements but not less than

30% of the dry matter intake on an average daily basis during the growing season.

§ 205.239 Livestock living conditions.

(a) The producer of an organic livestock operation must establish and maintain livestock living conditions which accommodate the health and natural behavior of animals, including:

(1) Access to the outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight suitable to the species, its stage of production life, the climate, and the environment;

(2) Access to pasture for ruminants, as required in 205.237(c).

(b) The producer of an organic livestock operation may provide temporary confinement for an animal because of:

(2) The animal's stage of production life; for ruminants this includes only:

- (i) birthing;
- (ii) dairy animals up to 6 months of age; or
- (iii) beef animals during a final finishing stage not to exceed 90 days.

Sincerely, Nancy Taylor
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